

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

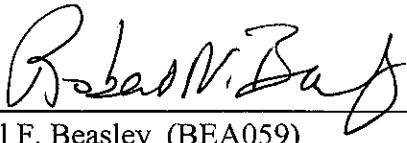
JAMES G. HUFFMAN)
)
Plaintiff,)
)
v.) CIVIL ACTION NO. 2:06-CV-748-MEF
) (WO)
SOUTHERN HEALTH SERVICES, *et al.*,)
)
Defendants.)

MOTION FOR EXTENSION OF TIME TO FILE SPECIAL REPORT AND ANSWER

Defendants, Southern Health Partners, Inc. (designated in the Complaint as "Southern Health Services Partners"), and Kenneth Nichols, M.D., (designated in the Complaint as both "Dr. Nichols" and "Dr. Nicholson, M.D.") hereby move this Court for an extension of time within which to file their Special Report and Answer. As grounds for said motion, Defendants hereby set down and assign the following:

1. On August 30, 2006, this Court entered an Order for Special Report. Said Order requires that Defendants submit a Special Report to this Court and an Answer within forty days of August 30, 2006, or by October 9, 2006.
2. Defendants have been attempting to gather the information required by the Court to complete the Special Report and Answer but have been unable to do so due to the unavailability of several of the key personnel who provided health care services to the plaintiff.

WHEREFORE, Defendants request a sixty day extension within which to complete their investigation and prepare the Special Report and Answer as directed by this Court.



Daniel F. Beasley (BEA059)
Robert N. Bailey, II (BAI045)
Attorneys for Defendants

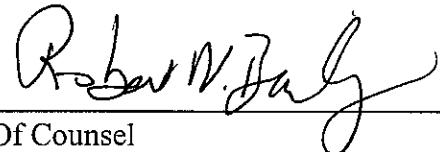
OF COUNSEL:

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Huntsville, AL 35801
(256) 535-1100

CERTIFICATE OF SERVICE

I hereby certify that I have mailed by United States Mail, postage prepaid, the document to the following non-CM/ECF participant on this the 2 day of October, 2006:

James G. Huffman
Autauga County Metro Jail
136 Court Street
Prattville, AL 36067



Of Counsel